

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION)	MDL No. 2804
OPIATE LITIGATION)	
)	Case No. 1:17-md-2804
THIS DOCUMENT RELATES TO:)	
)	Judge Dan Aaron Polster
ALL CASES)	
)	

PLAINTIFFS' MOTION FOR LEAVE TO FILE
EXHIBITS TO PLAINTIFFS' REPLY TO CARDINAL HEALTH'S OBJECTION TO
AMENDMENT TO DISCOVERY RULING NO. 14, PART 1 REGARDING
PRIVILEGE AND CLAW-BACK (Doc. 1407) UNDER SEAL

Pursuant to Local Rule 5.2, Plaintiffs seek leave of Court to file its Exhibits to Plaintiffs' Reply to Cardinal Health's Objection to Amendment to Discovery Ruling No. 14, Part I, Regarding Privilege and Claw-Back (ECF Doc. 1407) in the above-listed case under seal. Plaintiffs file this Motion and Proposed Order to ensure compliance with CMO No. 2: Protective Order (ECF Doc. 441) and the Protective Order Re: DEA's ARCOS/DADS Database (ECF Doc. 167). Plaintiff respectfully requests the option to proceed in this manner so there are no inadvertent disclosures of confidential information subject to CMO No. 2 or the ARCOS Protective Order.

WHEREFORE, Plaintiff respectfully requests the Honorable Court to grant Plaintiffs' Motion for Leave to File Exhibits to Plaintiffs' Reply to Cardinal Health's Objection to Amendment to Discovery Ruling No. 14, Part 1 Regarding Privilege and Claw-Back (Doc. 1407) Under Seal.

Respectfully Submitted,

Dated: March 5, 2019

/s/Michael J. Fuller, Jr.
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Member of the Plaintiffs' Executive Committee

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 5th day of March, 2019, I have electronically filed the foregoing with the Clerk of Court using the CM/ECF System. Copies will be served upon counsel of record by, and may be obtained through, the Court's CM/ECF System.

/s/Michael J. Fuller, Jr.

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